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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA                   :  
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v.   :  
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GENE F. KNORR                                   :

**CRIMINAL COMPLAINT**

Mag. No. 06-8209 (MCA)

I, Lucille M. Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about October 12, 2006, in Camden County, in the District of New Jersey, and elsewhere, defendant GENE F. KNORR did:

knowingly and wilfully possess material which contained at least three images of child pornography, as defined in 18 U.S.C. § 2256, which were shipped and transported in interstate and foreign commerce, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

I further state that I am a Special Agent for United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

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Lucille M. Pezzullo, Special Agent  
Department of Homeland Security  
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,  
October 17, 2006 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO  
UNITED STATES MAGISTRATE JUDGE

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Signature of Judicial Officer

## ATTACHMENT A

I, Lucille M. Pezzullo, a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about October 12, 2006, law enforcement officers conducted a search of 400 Raws Avenue, Somerdale, New Jersey, the residence of defendant Gene F. Knorr’s family (hereinafter “defendant KNORR”).

2. On or about October 12, 2006, law enforcement officers reviewed the contents of defendant KNORR’s computer hard drive which had been found at the residence of defendant KNORR’s family. Among the files on the hard drive, which was manufactured in Singapore, were more than sixty-five (65) images and videos of what appear to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of the images, which were found on defendant KNORR’s computer hard drive, are described as follows:

- a. **Image Number One:** This image depicts a prepubescent female engaging in sexual conduct with an adult male. The prepubescent female is fully nude and lying on a white surface with one leg stretched out straight in front of her and the other bent up at the knee with her foot resting on the white surface. The prepubescent female is leaning back on a multi-colored pillow and is visible from her head to her knees. Both arms of the prepubescent female are bent up at the elbows and her hands are resting on her chest. The adult male is fully nude and visible from his lower abdomen to his upper thighs. The left hand of the adult male is placed on his erect penis.
- b. **Image Number Two:** This image depicts a prepubescent female engaged in sexually explicit conduct. The female is fully nude and visible from her head to her upper thighs. The female is lying on her back on a pink-colored surface. Her head is turned toward the left, her legs are parted to expose her genital area, and her undeveloped breasts are visible. Her right leg is extended up into the air and her right leg is resting on the pink surface.

- c. **Image Number Three:** This image depicts a prepubescent female engaged in sexual intercourse with an adult male. The female is fully nude and is visible from her head to her knees. Her face is partially visible. The male is fully nude and is visible from his lower abdomen to his knees. The male is lying on his back on a bed with a brown wooden headboard covered with a multi-colored sheet. The legs of the male are slightly bent at the knees and parted and the male's right hand is placed on his penis which has been inserted into female's vagina. The prepubescent female is on top of the adult male with her legs straddling his body. The female's hands are placed on the upper thighs of the adult male.

3. Based upon my training and experience, and to the best of my knowledge, the images described in paragraphs 2a through 2c above, were downloaded from the Internet, based upon, among other things, defendant KNORR's own statements.

4. On or about October 13, 2006, law enforcement agents interviewed defendant KNORR who stated, in substance and in part, that a) he had purchased and downloaded images and videos of child pornography from the Internet to the hard drive of his computer; and b) that he believed that the images of child pornography he had viewed depicted actual children.